

**IN THE UNITED STATE BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:) Chapter 7
ASHLEY KNOWLES,)
) Case No: 19-34685
Debtor.)
) Hon. Carol A. Doyle

NOTICE OF MOTION

To: via ECF: David M. Siegel, davidsiegelbk@gmail.com
Ira Bodenstein, iratruster@foxrothschild.com
Patrick S Layng, USTPRegion11.ES.ECF@usdoj.gov

via USPS: Ashley Knowles, 3806 W. Washington Blvd., #D1, Chicago, IL 60624

Please take notice that on March 18, 2020 at 10:00 a.m., the undersigned shall appear before the Honorable Timothy A. Barnes in Courtroom 742, United Bankruptcy Court, 219 S. Dearborn, Chicago, Illinois, and present the **ILLINOIS DEPARTMENT OF HUMAN SERVICE'S MOTION TO EXTEND TIME TO FILE OBJECTION TO DISCHARGEABILITY OF A DEBT UNDER § 523**, a copy of which is attached and served on you.

Illinois Department of Human Services

By: /s/ Anna Stanley Kahriman
Anna Stanley Kahriman
Assistant Attorney General
100 W. Randolph Street, 13-204
Chicago, IL 60601
(312) 814-6140

CERTIFICATE OF SERVICE

I, Anna Stanley Kahriman, an attorney, hereby certify that on March 5, 2020, I caused a copy of this **NOTICE OF MOTION** and **ILLINOIS DEPARTMENT OF HUMAN SERVICE'S MOTION TO EXTEND TIME TO FILE OBJECTION TO DISCHARGEABILITY OF A DEBT UNDER § 523** to be served on the persons on the attached service list by electronic notification through the CM/ECF system or by U.S. Mail, postage prepaid.

/s/ Anna Stanley Kahriman

**IN THE UNITED STATE BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	Chapter 7
ASHLEY KNOWLES,)	
)	Case No: 19-34685
Debtor.)	
)	Hon. Carol A. Doyle

**ILLINOIS DEPARTMENT OF HUMAN SERVICES'S MOTION TO EXTEND TIME
TO FILE OBJECTION TO DISCHARGEABILITY OF A DEBT UNDER § 523**

NOW COMES the Illinois Department of Human Services ("DHS"), by its attorney Kwame Raoul, Illinois Attorney General, and hereby moves the Court for an extension of time within which to file a complaint to determine dischargeability under 11 U.S.C. § 523.

1. The Debtor filed a Petition for relief under Chapter 7 of the United States Bankruptcy Code on December 9, 2019.

2. The Chapter 7 meeting of creditors was first scheduled for January 10, 2020.

3. Pursuant to Bankruptcy Rule 4007, a complaint objecting to the discharge of a debt under § 523(c) must be filed within sixty days from the first date set for the meeting of creditors. Here, that deadline is March 10, 2020.

4. Pursuant to Bankruptcy Rule 4007(c), the Court may for cause extend the time fixed for filing a discharge complaint under § 523(c).

5. This request is being made prior to the expiration of the deadline to file a complaint under § 523(c).

6. DHS is a creditor in this case by virtue of certain public aid overpayments made to the Debtor.

7. DHS and its counsel require additional time to review the transactions and documents surrounding Debtor's application for, and receipt of, public aid funds to determine whether a complaint should be filed on the basis of fraud under § 523(a)(2).

8. DHS therefore requests an additional sixty (60) days from the date of this motion to investigate and file its adversary complaint, and requests an extension of time through and including May 9, 2020.

WHEREFORE, the Illinois Department of Human Services requests an order granting an extension of time of sixty (60) days, to and including May 9, 2020, within which to file a complaint to determine dischargeability of a debt pursuant to 11 U.S.C. § 523(c).

Respectfully Submitted,

Illinois Department of Human Services

By: Kwame Raoul
Illinois Attorney General

By: /s/ Anna Stanley Kahrman
Anna Stanley Kahrman
Assistant Attorneys General
Revenue Litigation Bureau
100 W. Randolph Street, 13-204
Chicago, IL 60601
(312) 814-6140
akahrman@atg.state.il.us